

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re:)	Chapter 11
)	
W. R. GRACE & CO., et al.)	Case No. 01-01139 (JKF)
)	(Jointly Administered)
Debtors.)	
)	Re: Docket Nos. 21747, 21911, 22014

**DEBTORS' COUNTER-DESIGNATION OF ITEMS TO BE
INCLUDED IN THE RECORD ON APPEAL**

Debtors, in accordance with Federal Rule of Bankruptcy Procedure 8006 and Local Bankruptcy Rule 8006-1, hereby designate additional items to be included in the record for the appeal of the Bank Lender Group from the May 19, 2009 Order and Memorandum Opinion Sustaining Debtors' Objection to Unsecured Claims Insofar as Claims Include Postpetition Interest at the Contract Default Rate of the United States Bankruptcy Court for the District of Delaware [Docket No. 21747].

**Additional Items From the Bankruptcy Court
Docket to be Included in the Record on Appeal**

Date	Bankruptcy Dkt. No.	Description
8/7/2008	19245	Certification of Counsel Submitting Stipulated Scheduling Order Relating to the Debtors' Objection to the Unsecured Claims Asserted Under the Debtors' Credit Agreements Dated as of May 14, 1998 and May 5, 1999
8/26/2008	19383	Certification of Counsel Regarding Scheduling Order for Debtors' Objection to the Unsecured Claims Asserted Under the Debtors' Credit Agreements Dated as of May 14, 1998 and May 5, 1999
10/17/2008	19779	Creditors' Committee's Objection to the Debtors' Motion for an Order Approving Debtors' Disclosure Statement for the Joint Plan of Reorganization Dated as of September 19, 2008, Solicitation and Confirmation Procedures, Confirmation Schedule and Related Relief
10/17/2008	19786	Bank Lender Group's Objection to Debtors' Motion for Entry of an Order Approving Disclosure Statement, Solicitation and Confirmation Procedures, Confirmation Schedule and Related Relief
10/17/2008	19790	Joinder in the Objection of Bank Lender Group to Debtors' Motion for Entry of an Order Approving Disclosure Statement, Solicitation and Confirmation Procedures, Confirmation Schedule and Related Relief
10/23/2008	19847	Letter Enclosing Transcript and Exhibits Relating to the Contested Hearing on Debtors Objection to Claims Asserted Under the Debtors Credit Agreements Dated as of May 14, 1998 and May 5, 1999
10/23/2008	19848	Consolidated Response to Objections to Disclosure Statement, Solicitation and Confirmation Procedures, Confirmation Schedule and Related Relief
10/27/2008	19891	Transcript of hearing held on October 20, 2008

11/13/2008	20006	Amended Transcript of hearing held on October 27, 2008
12/2/2008	20167	Transcript of hearing held on November 14, 2008
12/2/2008	20170	Transcript of hearing held on November 24, 2008
12/22/2008	20308	Creditors' Committee's Preliminary Objection to the First Amended Joint Plan of Reorganization Under Chapter 11 of the Bankruptcy Code of W.R. Grace & Co., et al., the Official Committee of Asbestos Personal Injury Claimants, the Asbestos PI Future Claimants' Representative, and the Official Committee of Equity Security Holders, Dated November 10, 2008
12/22/2008	20315	Bank Lender Group's Preliminary Objection to Confirmation of First Amended Joint Plan of Reorganization Under Chapter 11 of the Bankruptcy Code
12/24/2008	20358	Rule 2019 Statement (Amended and Restated)
12/29/2008	20371	Transcript of hearing held on December 15, 2008
1/13/2009	20514	Bank Lender Group's Objection to Plan Proponents' Proposed Amendments to Case Management Order
1/5/2009	20417	Response of the Official Committee of Unsecured Creditors to the Plan Proponents' Designation of Confirmation Issues
2/2/2009	20648	Transcript of hearing held on January 26, 2009
2/3/2009	20668	Exhibit Book to (1) First Amended Chapter 11 Plan and (2) Amended Disclosure Statement for the First Amended Joint Plan of Reorganization
2/4/2009	20671	Certification of Counsel Regarding Blacklines of Proposed Confirmation and Solicitation Procedures for First Amended Joint Plan of Reorganization
2/4/2009	20676	Certification of Counsel Regarding Blacklines of First Amended Plan of Reorganization, Disclosure Statement and Exhibit Book

2/27/2009	20866	Notice of Filing of Amended Proposed Confirmation and Solicitation Procedures for First Amended Joint Plan of Reorganization
3/9/2009	20936	Transcript of hearing held on February 23, 2009
3/9/2009	20944	Order Approving Disclosure Statement, Solicitation and Confirmation Procedures, Confirmation Schedule and Related Relief.
3/13/2009	21002	Bank Lender Group's Preliminary Witness Disclosure
3/13/2009	20997	Rule 2019 Statement (Second Amended and Restated)
3/13/2009	20998	Exhibit --The Official Committee Of Unsecured Creditors Preliminary Witness Disclosure
3/25/2009	21104	Transcript of hearing held on March 9, 2009
5/8/2009	21579	Bank Lender Group's Limited Objection To Libby Claimants' Motion (A) to Amend Plan Confirmation Case Management Order and (B) to Postpone Phase II of Confirmation Hearing
5/15/2009	21715	Disclosure Affidavit The Official Committee of Unsecured Creditors' Final Witness Disclosure for "Phase I" Matters
5/20/2009	21789	Objection of Bank Lender Group to Confirmation of First Amended Joint Plan of Reorganization Under Chapter 11 of the Bankruptcy Code
5/20/2009	21790	Objection of The Official Committee Of Unsecured Creditors To Confirmation Of The First Amended Joint Plan Of Reorganization Under Chapter 11 Of The Bankruptcy Code Of W.R. Grace & Co., Et Al., The Official Committee Of Asbestos Personal Injury Claimants, The Asbestos PI Future Claimants Representative, And The Official Committee Of Equity Security Holders, Dated February 27, 2009
6/2/2009	21959	Motion of the Official Committee of Unsecured Creditors to Modify Third Amended Case Management Order Related to the First Amended Joint Plan of Reorganization

6/2/2009	21960	Motion of the Official Committee Of Unsecured Creditors For Leave From The Courts Scheduling Order And Shortening The Notice Period With Respect To The Creditors Committees Motion To Modify Third Amended Case Management Order Related To The First Amended Joint Plan Of Reorganization
6/3/2009	21972	Motion to Amend Motion to Modify The Third Amended Case Management Order Related To The First Amended Joint Plan Of Reorganization
6/4/2009	21987	Order Granting Motion for Leave from this Court's Scheduling Order so as to Shorten Notice and Expedite Consideration of Bank Lender Group's Motion to Modify the Third Amended Case Management Order Related to the First Amended Joint Plan of Reorganization
6/9/2009	22021	Plan Proponents' Consolidated Phase I Brief in Support of Confirmation of Joint Plan of Reorganization Under Chapter 11 of the Bankruptcy Code
6/11/2009	22056	Plan Proponents' Response In Opposition to Motions of the Lenders and Unsecured Creditors' Committee to Modify Third Amended Case Management Order Related to the First Amended Joint Plan of Reorganization
6/11/2009	22058	Order Granting Motion for Leave from Scheduling Order and Shortening Time Periods on Motion of Official Committee of Unsecured Creditors to Modify Third Amended Case Management Order Related to First Amended Joint Plan of Reorganization
6/12/2009	22084	Notice of Service of The Official Committee of Unsecured Creditors Witness Disclosure List for "Phase II" Matters
6/15/2009	22119	Motion for Leave of Bank Lender Group to File a Reply to Plan Proponents' Response in Opposition to Motions to Modify the Third Case Management Order Related to the First Amended Joint Plan of Reorganization
6/16/2009	22133	Notice of Service of Bank Lender Group's Witness Disclosure for Phase II Matters

6/16/2009	22135	Joinder of the Official Committee of Unsecured Creditors to the Bank Lender Group's Motion for Leave to File a Reply to Plan Proponents Response in Opposition to Motions to Modify the Third Case Management Order Related to the First Amended Joint Plan of Reorganization
TBD	TBD	Transcript of hearing held on June 18, 2009

Dated: June 18, 2009

Respectfully submitted,

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